

Biofuels Task Force comments as testified to in Boston March 11, 2008.

Line 74: ASTM standards adopted - very important as there is no satisfactory remedy to "offspec" sales. Many states adopt ASTM automatically. Remember in 2006, 50% of biodiesel samples were off-spec. What is forgotten is that the current spec for biodiesel ASTM (6751) was inadequate and has since been much improved.

The chosen mandate is brilliant as was the state pilot program. I concur with Mike Ferrante that the "devil is in the detail." A macro volumetric standard is needed as some areas will be logistically and geographically extremely difficult to procure and blend. Please be cautious in not going too high up the supply chain, as in only at the terminal level.

There is a bias for terminal injection blending only to be required. This grew out of the many quality problems associated with biodiesel and many falsely blamed manufacturing defects on "splash blenders." There exists many competent "splash blenders" and that is all there was for the first ten years of this industry.

Similarly, BQ9000 is advocated because of poor ASTM specs. BQ9000 discriminates in favor of big companies and bureaucracies. Biodiesel has been an entrepreneurial small company phenomena. Think Apple vs. IBM or Davis vs. Goliath.

Thanks again.